

DECLARACION JURADO DE VALERIO JULIAN DE LA CRUZ
SANTOS

Yo, Valerio Julian de la Cruz Santos, digo y declaro lo siguiente:

1. Mi nombre es Valerio Julian de la Cruz Santos. Yo soy el padre de Obel Cruz-Garcia.
2. Yo nací el [REDACTED] en el pueblo de Boba en la Republica Dominicana. Yo tengo una familia bien grande. Mi padre tuvo veinte y cuatro niños con tres diferentes mujeres. Aquí, en la Republica Dominicana, no es raro que hombres tienen familias muy grandes y que tienen hijos con mas de una mujer.
3. Yo crecí en un campo llamado Boba en la Republica Dominicana. Crecí con mi padre Regino de la Cruz Martinez. Nosotros teníamos un granja y bacas y nosotros trabajábamos los campos para ganarnos la vida. También sembrábamos arroz. Nosotros vivimos de la tierra.
4. Mi madre, Ramona Santos, estaba casada con un hombre llamado Enrique de la Cruz, un hombre que no era mi padre. Yo estaba bien allegado a mi madre y mas después viví con ella y mi padrastro cuando Obel era niño.
5. Cuando tenía quince años de edad, yo dejé de ir a la escuela y me fui a trabajar como un manejador de excavadoras con algunos de mis hermanos. Cuando tenía veinte y dos años de edad, me metí a el ejercito de el Republica Dominicana, a la marina de guerra, donde estudié medicina. Me entrenaron para trabajar como paramédico. Cuando después tenía problemas con mis pulmones, yo me salí del ejercito y me fui a trabajar como un paramédico civil.



6. La madre de Obel se llamaba Dahlia. Ella y yo nos conocimos en 1957.

Yo tenia veinte y tres años y estaba trabajando en una clínica medica del vecindario cerca de donde ella vivía. Ella tenia catorce años de edad en ese tiempo. Nosotros tuvimos cuatro niños juntos: Noemi, Obel, Natalia, y Joel. Dahlia tenía como diez y nueve años cuando nacio Obel. Yo era el único que proveía para mi familia, trabajando como paramédico. Dahlia se quedaba en la casa y cuidaba de los niños. Nosotros teníamos una relación bien amante y estábamos bien contentos. Nosotros vivimos en una casa que yo construye en Santo Domingo en la Republica Dominicana.

7. En 1975, cuando Obel tenia como 15 años de edad, Dahlia y yo nos sepáramos. Yo me había herido en un accidente automovilístico. Cuando la accidente ocurrió, yo estaba parado en el lado de la calle enseguida de un carro que estaba estacionado cuando un carro impacto a mi y el carro y el accidente me causo mucho daño. Yo estaba en el hospital por dos meses. Durante este tiempo, una de las hermanas de Dahlia la convenció que yo no iba a poder proveer para su familia. Ella convenció a Dahlia que ella se necesitaba que regresar a Venezuela donde estaba su familia. Esto me dolió mucho y por esta razón nos sepáramos.

8. Yo mude a Boba con nuestros cuatro hijos. Nosotros vivimos cerca de mi madre y mi padrastro, y ellos mi ayudaron crecer a mis niños. Durante este tiempo, Obel me ayudo mucho. El era un trabajador bueno, y una persona maravillosa. El tenia muchos amigos buenos y el mantenía relaciones buenas con ellos. El era responsable y tenia un perro que cuidaba y le puso Tesoro de nombre. Había ocasiones cuando



Obel me dijo que extrañaba a su madre, pero yo creo que el estaba bien después de nuestra separación.

9. Obel era valiente y fuerte como joven. El me ayudaba pescar, y veníamos los peces y agarrábamos. Nosotros pescábamos por todo lo que podíamos capturar, hasta pescábamos por tiburones y por pescados locales llamados sabalo. Yo me recuerdo de una ocasión cuando estábamos pescando y las aguas estaban bien tormentosas. El barco se volteo y yo me quede atrapado de bajo de ella. Aunque Obel nomas era niño, tenía como 17 años el se metió en las aguas y me rescató.
10. Cuando Obel tenia diez y nueve años, el se mudo a Puerto Rico. Yo estaba triste que se fue. Nosotros tuvimos una relación muy buena, y aun después de que se mudo, hablábamos por teléfono casi todos los días. Estaba difícil para mi cuando se fue, pero mucha gente se estaban mudando del Republica Dominicana a Puerto Rico. Todos entendían que si te fueras allí, pudrías obtener la documentación propia para vivir en los Estados Unidos. Le dije a Obel que le extrañaba, pero que había lugares donde el se podría ir para vivir una vida mejor de la que estábamos viviendo en la Republica Dominicana. Aunque estábamos contentos, teníamos muy poco.
11. Obel viajaba a la Republica Dominicana regularmente y últimamente mudo para atrás. Como adulto, la gente conocía y amaban a Obel. El era un gran hombre. El siguió siendo una persona que trabajaba duro, una persona respetuoso, y una persona que ayudaba a todos. El daría el dinero de su bolsa a los que estaban en necesidad. También era bien religioso y asistió a la iglesia regularmente.
12. Yo estoy teniendo un tiempo bien difícil porque no puedo hallar una manera de tratar con la crimen por cual Obel fue condenado. Yo

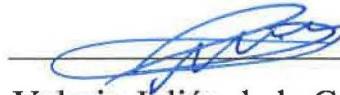


verdaderamente estoy batallando con esto porque este no es el Obel que yo conozco. Yo se que Obel fue arrestado antes y que fue encarcelado en Puerto Rico. Yo le visitaba y le traía libros religiosos para que los leerá. Hasta en la cárcel en Puerto Rico, Obel era el hombre considerado y religioso que yo conocía.

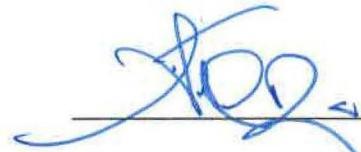
13. Yo me hubiera gustado venir a los Estados Unidos y testificar para Obel en su juicio, pero el equipo de defensa nunca me pidió que fuera dar testimonio. Yo hubiera dicho al jurado como amaba y respectaba a mi hijo. Yo tambien hubiera dicho al jurado de la ocasión cuando Obel arriesgo su vida para salvar la mía, cuando salvo mi vida de las aguas tormentosas durante ese tiempo que fuimos pescando. Los jurados necesitaron saber que duro de trabajador era y como era una gran persona.

14. Yo he leído y revisado esta declaración de 4 páginas

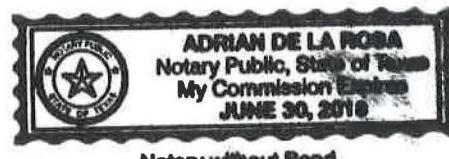
Yo declare bajo pena de perjurio y bajo las leyes del estado de Texas, que lo anterior es verdadero y correcto según mi mejor conocimiento y que este declaración jurado fue ejecutado el 15 de Marzo, 2015 en Bella Vista
República Dominicana


Valerio Julián de la Cruz Santos

Subscribed and sworn to before me on March 15 2015.



Notary Public, State of Texas



CERTIFICATION OF SARAH VALENZUELA

I, Sarah Valenzuela, state and declare as follows:

1. My name is Sarah Valenzuela. I currently live in Austin, Texas. I am fluent in both English and Spanish.
2. I am a native Spanish speaker, born in El Paso, Texas. Spanish was my first language, and I speak Spanish regularly with several family members. I also took formal Spanish classes for native speakers during high school. I am able to speak, read, and write in Spanish proficiently.
3. I am currently a third-year law student at the University of Texas School of Law. I expect to receive my Juris Doctor (J.D.) degree in May of 2015. In September of 2015, I will begin a one-year clerkship with the Honorable Philip R. Martinez, a federal district judge in El Paso, Texas.
4. In January of 2015, I began a law-student clerkship with the Office of Capital Writs (“OCW”). In March 2015, I was asked by the OCW to translate several English-language affidavits into Spanish.
5. The attached notarized affidavit signed by *Valero Julian de la Cruz Santos* is the Spanish-language affidavit I translated from an English-language affidavit provided to me by the OCW. The English-language version of the affidavit is also here attached.

6. I declare under penalty of perjury under the laws of the State of Texas that the signed document is a true and correct translation of the English-language text that I originally received.

Executed on 4/28/15

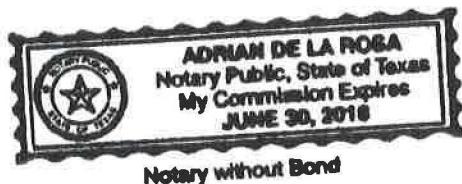


Sarah Valenzuela

Subscribed and sworn to before me on April 28, 2015



Notary Public, State of Texas



AFFIDAVIT OF VALERIO JULIAN DE LA CRUZ SANTOS

I, Valerio Julian de la Cruz Santos, state and declare as follows:

1. My name is Valerio de la Cruz Santos. I am Obel Cruz-Garcia's father.
2. I was born on January 28, 1938, in the village of Boba in the Dominican Republic. I have a very large family. My father had twenty-four children with three different women. Here in the Dominican Republic, it is not unusual for men to have a large family and have children with more than one woman.
3. I grew up in a village called Boba in the Dominican Republic. I was raised by my father, Regino de a Cruz Martinez. We had a farm and cows, and we worked the fields for our living. We also grew rice. We lived off the land.
4. My mother, Ramona Santos, was married to a man named Enrique de la Cruz, a different man than my father. I was close to my mother, and later lived with my mother and my stepfather when Obel was a child.
5. When I was fifteen years old, I left school and went to work as a bulldozer driver with some of my brothers. At twenty-two, I joined the Dominican Republic military, the Navy, where I studied medicine. I was trained and worked as a paramedic. When I later developed lung problems, I left the military and went to work as a civilian paramedic.
6. Obel's mother was named Dahlia. She and I met in 1957. I was twenty-three years old and working in a neighborhood medical clinic near where she lived. She was fourteen years old at the time. We had four children together: Noemi, Obel, Natalia, and Joel. Dahlia was about 10 years old when Obel was born. I was the sole provider for the family, working as a paramedic. Dahlia would stay home and take care of the kids. We had a

very loving relationship and were very happy. We lived in a house that I built for us in Santo Domingo, Dominican Republic.

7. In 1975, when Obel was about 15 years old, Dahlia and I separated. I had been injured in a car accident. When the accident occurred, I was standing on the side of the road alongside a parked car, when another car hit us and hurt me pretty badly. I was in the hospital for two months. During this time, one of Dahlia's sisters convinced her that I would no longer be able to work or take care of my family. She convinced Dahlia that she needed to leave me and go back to Venezuela where her family was. This hurt me very much and this is the reason we separated.
8. I moved to Boba with our four children. We lived near my mother and stepfather, and they helped me to raise my children. During this time, Obel was really helpful to me. He was a hard worker, and just a wonderful individual. He had several good friends that he kept good relationships with. He was responsible and even had a dog named Treasure that he took care of. There were occasions that Obel told me that he missed his mother, but I think he was alright after the separation.
9. Obel was brave and strong even as a youth. He would help me fish, which we would eat and sell. We would fish for anything we could catch, including sharks and a local fish called sabalo. I remember a time when we were out fishing and the waters were very rough. The boat turned over and I got trapped underneath. Even though Obel was just a kid, only about seventeen years old, he jumped in and saved me.
10. When Obel was nineteen, he moved to Puerto Rico. I was sad to have him leave. We had a great relationship, and even after he moved, we would speak on the phone almost every day. It was hard for me when he left, but a

lot of people were moving from the Dominican Republic to Puerto Rico. It was understood that if you went there, you would be able to get proper documentation that would allow you to live in the United States. I told Obel that I would miss him, but that there were places he could go to live a better life than we were living in the Dominican Republic. Even though we were happy, we had very little.

11. Obel would travel back to the Dominican Republic regularly, however, and eventually moved back. As an adult, people knew and loved Obel. He was a great man. He continued to be hard working, a respectful person, and a person that helped everyone. He would give you the money out of his pocket if you needed it. He also was very religious and regularly attended church.
12. I am having such a hard time finding a way to deal with the crime for which Obel was convicted. I really struggle with it, because this is not the Obel that I know. I know that Obel was arrested before and in jail in Puerto Rico. I would visit him and bring him religious books to read. Even in jail in Puerto Rico, Obel was still the thoughtful, religious man I knew him to be.
13. I would have been happy to come to the United States and testify on Obel's behalf at his trial, but the defense team never asked me to testify. I would have told the jury how much I love and respect my son. I would have told the jury about the time that Obel risked his life to save mine, when he rescued me from the rough waters while we were fishing. The jurors needed to know what a hard-worker and good person he is.
14. I have read and reviewed this _____ page affidavit.

I declare under penalty of perjury under the laws of the State of Texas that the foregoing is true and correct to the best of my knowledge and that this affidavit was executed on _____ of March, 2015 in _____.

Valerio Julián de la Cruz Santos

Subscribed and sworn to before me on March ____, 2015.

Notary Public, State of Texas